

John E. Bohyer
Fred Simpson
BOHYER, SIMPSON & TRANEL, P.C.
283 West Front, Suite 201
Post Office Box 7729
Missoula, Montana 59807-7729
Telephone: (406) 532-7800
Facsimile: (406) 549-2253

Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF MONTANA

BILLINGS DIVISION

TIMOTHY McCOLLOUGH,)	Cause No. CV-07-166-BLG-RFC-CSO
)	THE HON. CAROLYN S. OSTBY
Plaintiff,)	
)	
-vs.-)	DEFENDANT JOHNSON,
)	RODENBURG & LAUINGER'S
JOHNSON, RODENBURG &)	RESPONSES TO PLAINTIFF'S
LAUINGER,)	THIRD COMBINED DISCOVERY
)	REQUESTS
Defendant.)	

TO: Plaintiff and his attorney of record, John Heenan, Esq. of Heenan Law Firm:

Pursuant to the Federal Rules of Civil Procedure, Defendant Johnson, Rodenburg & Lauinger supplements its responses to Plaintiff's Third Combined Discovery Requests as follows:

Defendant objects to Plaintiff's definitions and requirements to the extent that they impose requirements beyond those of the Federal Rules of Civil Procedure.

DEFENDANT JOHNSON, RODENBURG & LAUINGER'S RESPONSES
TO PLAINTIFF'S THIRD COMBINED DISCOVERY REQUESTS

Page 1

REQUEST FOR PRODUCTION NO. 31: Please produce any contract whatsoever entered into between you and CACV.

RESPONSE TO REQUEST FOR PRODUCTION NO. 31: Defendant is researching this request and will supplement.

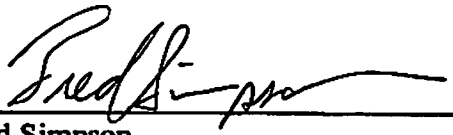
SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 31:
Objection, this request seeks work-product and information protected by the attorney-client privilege. Defendant further objects to this request on the basis that it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR PRODUCTION NO. 32: Please produce any franchise agreement to which you are a party, including but not limited to any franchise agreement entered into between yourself and any of the parties identified in your supplemental answer to Interrogatory No. 10.

RESPONSE TO REQUEST FOR PRODUCTION NO. 32: Defendant is researching this request and will supplement.

SUPPLEMENTAL RESPONSE TO REQUEST FOR PRODUCTION NO. 32:
None.

DATED this 14th day of October, 2008.


Fred Simpson
BOHYER SIMPSON & TRANEL, P.C.
Attorneys for Defendant